

1 2. The date(s) on which you were served with a copy of the summons.

2 The plaintiff served Wells Fargo with a copy of the summons on February 15, 2012.

3 3. In removals based on diversity jurisdiction, the names of any served defendants
4 who are citizens of Nevada, the citizenship of the other parties and a summary of
5 defendant's evidence of the amount in controversy.

6 None of the served defendants are citizens of Nevada. Wells Fargo is a citizen of South
7 Dakota. Wells Fargo is informed and believes that National Default Servicing Corporation is an
8 Arizona corporation with its principal place of business in Arizona. Wells Fargo is informed and
9 believes that the plaintiff is a citizen of Nevada. The plaintiff seeks an injunction preventing
10 Wells Fargo from enforcing the deed of trust.

11 Toromanova alleges that she executed a promissory note (the "Note") and deed of trust
12 (the "Deed of Trust") for the purchase of certain real property located at 2912 Hot Cider Avenue,
13 North Las Vegas, Nevada 89031 (the "Property") in March 2006. The Note and Deed of Trust
14 evidence a loan in the amount of \$288,000. Toromanova asks this Court to enjoin all foreclosure
15 or eviction activities with respect to the Property and, further, to rescind the Trustee's Deed and
16 restore her "right of seisin in the land and its improvements," apparently seeking outright
17 ownership of the Property. Accordingly, the amount in controversy exceeds \$75,000.

18 4. If your notice of removal was filed more than thirty (30) days after you
19 first received a copy of the summons and complaint, the reason removal
20 has taken place at this time and the date you first received a paper
21 identifying the basis for removal.

22 Not applicable.

23 5. In actions removed on the basis of the court's jurisdiction in which the action in
24 state court was commenced more than one year before the date of removal, the
25 reasons the action should not summarily be remanded to the state court.

26 Not applicable.

1 6. The name(s) of any defendant(s) known to have been served before you filed the
2 notice of removal who did not formally join in the notice of removal and the
3 reasons they did not.

4 Not applicable.

5 DATED this 8th day of March 2012.

6 DAVID J. MERRILL, P.C.

7 By:

8 

9 DAVID J. MERRILL

10 MORGAN F. SHAH

11 10161 Park Run Drive, Suite 150

12 Las Vegas, Nevada 89145


13 (702) 566-1935

14 Attorneys for WELLS FARGO BANK, N.A.

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on the 8th day of March 2012, service of the foregoing Statement Concerning Removal was made to all counsel in the action through the Court's CM/ECF system. In addition, service was made to the plaintiff by placing a copy in the United States Mail, postage prepaid and addressed to the plaintiff at her last known address:

Dimitritza Toromanova
2912 Hot Cider Avenue
Las Vegas, Nevada 89031


An employee of David J. Merrill, P.C.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DIMITRITZA TOROMANOVA,

Plaintiff(s),

vs.

WELLS FARGO BANK, N.A., et al.,

Defendant(s).

2:12-cv-00328-GMN -CWH

MINUTES OF THE COURT

February 29, 2012

PRESENT:

The Honorable Gloria M. Navarro, U.S. District Judge

Deputy Clerk: Molly Morrison

Recorder/Reporter: None Appearing

Counsel for Plaintiff(s): None Appearing

Counsel for Defendant(s): None Appearing

MINUTE ORDER IN CHAMBERS:

TO ALL PARTIES REMOVING ACTIONS TO THE COURT:

You must, no later than fifteen (15) days from the date hereof, file and serve a signed statement under the above case number and caption that sets forth the following information:

1. The date(s) on which you were served with a copy of the complaint in the removed action.
2. The date(s) on which you were served with a copy of the summons.
3. In removals based on diversity jurisdiction, the names of any served defendants who are citizens of Nevada, the citizenship of the other parties and a summary of defendant's evidence of the amount in controversy.
4. If your notice of removal was filed more than thirty (30) days after you first received a copy of the summons and complaint, the reason removal has taken place at this time and the date you first received a paper identifying the basis for removal.

5. In actions removed on the basis of the court's jurisdiction in which the action in state court was commenced more than one year before the date of removal, the reasons this action should not summarily be remanded to the state court.
6. The name(s) of any defendant(s) known to have been served before you filed the notice of removal who did not formally join in the notice of removal and the reasons they did not.

IT IS FURTHER ORDERED that all defendants who joined in the notice of removal may file the statement required by the foregoing jointly.

IT IS FURTHER ORDERED that counsel shall have thirty (30) days within which to file a Joint Status Report which must:

1. Set forth the status of this action, including a list of any pending motions and/or other matters which require the attention of this court.
2. Include a statement by counsel of action required to be taken by this court.
3. Include as attachments copies of any pending motions, responses and replies thereto, and any prior court orders or other matters requiring the court's attention which have not previously been filed and are not available on the federal docket for review by this court. Please note that documents filed in the state case are not available to this court for review unless they are attached to the Petition for Removal, the Statement Regarding Removal, or re-filed in federal court.

IT IS FURTHER ORDERED that the removing defendant(s) shall serve a copy of this Order on all other parties to the action no later than the time they file and serve a copy of the Statement required by this Order. A party who learns that the Statement(s) filed pursuant to this Order contain(s) incorrect information shall promptly notify this court in writing.

IT IS SO ORDERED.

The date of the Clerk's file stamp shall constitute the date of this order.

LANCE S. WILSON, CLERK

By: /s/ Molly Morrison

Deputy Clerk